

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ALEK SCHOTT

Plaintiff,

v.

JOEL BABB, in his individual and official capacity; MARTIN A. MOLINA III, in his individual and official capacity; JAVIER SALAZAR, in his individual and official capacity; and BEXAR COUNTY, TEXAS,

Defendants.

Civil Action No. 5:23-CV-00706-OLG-RBF

**JOINT MOTION TO EXTEND THE DEADLINE TO FILE
DISPOSITIVE MOTIONS AND SET A BRIEFING SCHEDULE**

Plaintiff Alek Schott and Defendant Bexar County, Texas (the “Parties”¹) respectfully request an extension of time to file dispositive motions and a briefing schedule as follows:

1. Pursuant to this Court’s Order to Extend Scheduling Order Deadlines, the deadline to file dispositive motions is April 11, 2025. ECF No. 108 (Text Order).

2. The Parties request the Court extend the deadline to file dispositive motions and set a briefing schedule to accommodate litigation deadlines, trial dates, scheduling conflicts, and the Court’s pending decision on three motions to strike expert testimony, as follows:

- a. Dispositive Motions: June 11, 2025;
- b. Responses to Dispositive Motions: July 2, 2025; and
- c. Replies in Support of Dispositive Motions: July 16, 2025.

¹ Plaintiff’s unopposed motions to dismiss Defendants Joel Babb and Martin A. Molina III (ECF Nos. 100 & 103) remain pending at this time.

3. The Parties do not seek this extension for purposes of delay, nor will this motion prejudice the Parties.

Dated: March 19, 2025.

Respectfully submitted,

LAW OFFICES OF CHARLES S. FRIGERIO
A Professional Corporation
Riverview Towers
111 Soledad, Suite 465
San Antonio, Texas 78205
(210) 271-7877

/s/ Christen M. Hebert
Christen M. Hebert (TX Bar No. 24099898)
INSTITUTE FOR JUSTICE
816 Congress Avenue, Suite 970
Austin, TX 78701
(512) 480-5936
chebert@ij.org

BY: /s/ Charles S. Frigerio
CHARLES S. FRIGERIO
SBN: 07477500
Email: csf@frigeriolawfirm.com

HECTOR X. SAENZ
SBN: 17514850
Email: hxs@frigeriolawfirm.com

CHARLES A. FRIGERIO
SBN: 24140090
NMBN: 161626
Email: Charlie@Frigeriolawfirm.com

Joshua A. Windham* (NC Bar No. 51071)
William R. Aronin* (NY State Bar No. 4820031)
INSTITUTE FOR JUSTICE
901 N. Glebe Road, Suite 900
Arlington, VA 22203
(703) 682-9320
jwindham@ij.org
waronin@ij.org

*Admitted *pro hac vice*

Attorneys for Plaintiff

ATTORNEYS FOR BEXAR COUNTY, TEXAS

CERTIFICATE OF SERVICE

I certify that on March 19, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will provide electronic service upon all attorneys of record.

/s/ Christen Mason Hebert
Christen Mason Hebert